

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Part 97 of the Commission's)	RM-10787
Amateur Service Rules to Eliminate)	
Morse Code Testing)	
)	
To: The Commission)	

COMMENTS TO THE PETITION

I concur with the above referenced petition (“the Petition”) filed by the National Conference of Volunteer Examiner Coordinators (“NCVEC”) in all respects.

I joined the ranks of Amateur Radio licensees with a Technician license in 1995, and have been licensed continuously since that time. I have held an Amateur Extra Class operator license since 1995.

BACKGROUND

Why was a telegraphy skill requirement for an Amateur Radio operator license needed at all?

In the first days of radio, every station, be it Commercial, Military, or Amateur, all used “spark” transmitters. By their very nature, spark generated signals are very wasteful of spectrum space, and interference between users is difficult or impossible to avoid. The basis of the requirement for an Amateur licensee to demonstrate skill in sending and receiving Morse code signals was to insure that they (the Amateurs) could understand instructions to stand by or cease operating if they were interfering with important communications from government or military stations. This was of particular importance in life threatening situations.

Also, as it turned out, it was useful to have a “pool” of operators trained in the use of manual telegraphy in the event of war. Such individuals were of prime interest to the military for many years. Indeed, in both WW1 and WW2, Amateur radio operators were sought by the military for their communications skills.

THE SITUATION TODAY

Morse code skills are no longer required for either of the original reasons.

The primary reason for insuring that Amateur Radio operators could understand and reply using Morse code has disappeared. Modern radio systems are sufficiently capable of rejecting interfering signals, so much so that mutual interference is a non-issue. The use of narrow band signals, improved engineering practice, and modern spectrum management have made the issue obsolete.

Military, government and commercial uses of Morse code have declined or completely disappeared. While our military still uses some specially trained “intercept operators” to gather intelligence from Morse code signals of other countries, the use of Morse by our own forces has ceased. Modern signal encryption and processing techniques, together with the type and quantity of information being transmitted make the use of Morse code inadequate for the task. Therefore, it’s use has ceased. The same situation is true for other government and commercial users. Other than the Amateur service, no other service has a present requirement for, or interest in, the use of Morse code.

Morse code skills do not make a “better” Amateur Radio operator.

Morse code testing has been removed as a requirement for the Technician class Amateur Radio license for some years now. There have been no indications of a measurable increase in illegal activities on the Amateur bands at VHF and higher frequencies. The percentage of illegal and questionable operations by Amateur Radio licensees, code free license or not, while regrettably not zero, remains very small, according to comments by Riley Hollingsworth of the FCC’s enforcement division. There is no reason to expect that granting of code-free licenses for HF access would result in an increase in illegal operation or be in any way different from the VHF experience.

SUMMARY

I favor terminating the telegraphy skill requirement for all classes of Amateur Radio licenses, including the removal of Element 1, as defined in sections § 97.501(a) and (b) of the Commission’s rules. I also favor an immediate end to testing for Morse code skills, as defined in section §97.503(a) of the Commission’s Rules. I also favor the immediate granting of “Technician Plus” privileges to all existing Technician class Amateur Radio licensees.

Respectfully submitted,

Kyle W. Sandel
Amateur License AL7J
Anchorage, AK 99508
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